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Proposed Attorneys for Debtor

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE	§	
	§	
DFW BOAT SPECIALISTS, LLC	§	CASE 23-40316
	§	
DEBTOR	§	

**MOTION FOR AN EXTENSION OF TIME TO FILE SCHEDULES OF ASSETS  
AND LIABILITIES. SCHEDULES OF EXECUTORY CONTRACTS AND  
UNEXPIRED LEASES. AND STATEMENTS OF FINANCIAL AFFAIRS**

**NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN  
OBJECTION OR REQUEST FOR HEARING IS FILED WITH THE UNITED STATES  
BANKRUPTCY CLERK, 660 N. CENTRAL EXPRESSWAY, 3<sup>RD</sup> FLOOR, PLANO, TEXAS  
75074, WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF THE FILING OF THIS  
MOTION, UNLESS THE COURT, SUA SPONTE, OR UPON TIMELY APPLICATION OF  
A PARTY IN INTEREST, SHORTENS OR EXTENDS THE TIME FOR FILING SUCH  
OBJECTION OR REQUEST FOR HEARING.**

**IF NO OBJECTION OR REQUEST FOR HEARING IS TIMELY FILED, THE  
MOTION SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER  
AN ORDER GRANTING THE RELIEF SOUGHT. THE COURT RESERVES THE RIGHT  
TO SET ANY MATTER FOR HEARING.**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, DFW Boat Specialists, LLC (“Boat”), Debtor and Debtor-in-Possession in  
the above-styled and numbered cause, and pursuant to 11 U.S.C. § 1127 files this its Motion for

Extension of Time to file Schedules of Assets and Liabilities, Schedules of Executory Contracts and Unexpired Leases and Statements of Financial Affairs ("Motion"), and in support thereof would respectfully show unto the Court as follows:

### **I. JURISDICTION AND VENUE**

This Court has jurisdiction to consider the Motion creating this contested matter 1. pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), and (O). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The relief requested in the Motion is authorized under 11 U.S.C. § 521 and § 1107(a) and may be implemented in accordance with Fed.R.Bankr.P. 1007, 9006(c), 9007, and 9014 and Local Bankruptcy Rule 1007.1(a).

### **II. BACKGROUND**

The Debtor's business consists of the ownership of a car dealership in denton 2. Texas. The Debtor has complex financial dealings and Debtor needs additional time to gather and coordinate all the proper records to accurately prepare the Schedules and Statement of Financial affairs.

### **III. RELIEF REQUESTED**

Debtor seeks an extension of the period in which to complete and file their schedules 3. of assets and liabilities, schedules of executory contracts and unexpired leases, and statements of financial affairs (collectively, the "Schedules and Statements") as required by section 521 of the Bankruptcy Code and Rule 1007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

5. The substantial size, scope and complexity of this case and the volume of material that must be compiled and reviewed by Debtor to complete the Schedules and Statements for the

Debtor during the hectic early days of this Chapter 11 case provides ample cause justifying, if not compelling, the requested extension.

6. Completing the Schedules and Statements for each of the Debtor requires the collection, review and assembly of a substantial amount of financial documents and analysis of the necessary information requires an expenditure of substantial time and effort on the part of the Debtor. Given the significant burdens already imposed on Debtor's management by the commencement of this Chapter 11 case, Debtor requests additional time to complete and file the required Schedules and Statements.. Debtor anticipates that it will be able to file the Schedules and Statements, all in the appropriate formats prescribed by the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules of this Court, by March 21, 2023 which is approximately thirty (30) days after the Petition Date.

7. Bankruptcy Rule 1007(c) provides for the extension, for cause, of the time for the filing of the Schedules and Statements. In view of the size of the Debtor's case and the amount of information that must be assembled and compiled, ample cause exists for the requested extension.

## **V. CONCLUSION**

WHEREFORE, the Debtors respectfully request that the Court extend the Debtor's time to file their schedules of assets and liabilities, schedules of executory contracts and statements of financial affairs until March 21, 2023, and granting such other and further relief as is just and proper.

Respectfully submitted,

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BY: /s/ Eric Liepins  
ERIC A. LIEPINS, SBN 12338110

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was sent to the United States Trustee, and all creditors on the attached matrix on this the 7th day of March 2023.

/s/ Eric Liepins  
Eric A. Liepins